UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

RAUL SIANCAS, individually and on behalf of all others similarly situated,

Plaintiffs,

-against-

Rallye Motors, LLC, Rallye Motors Holding LLC, Rallye Leasing, Inc., Rallye Glen Cove, LLC, Rallye Northern, LLC, Rallye Roslyn, LLC, Rallye Roslyn Holding, LLC, Rallye Westbury, LLC, and Exclusive Detailing, Inc.,

Defendants.

CV: 14-6151 (JS) (SIL)

STIPULATION TO VACATE DEFAULT AS TO THE RALLYE DEFENDANTS AND EXTEND TIME TO ANSWER FOR THE RALLYE DEFENDANTS

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff and

Defendants, Rallye Motors, LLC, Rallye Motors Holding LLC, Rallye Leasing, Inc., Rallye Glen Cove, LLC, Rallye Northern, LLC, Rallye Roslyn, LLC, Rallye Roslyn Holding, LLC, Rallye Westbury, LLC (collectively, the "Rallye Defendants"), as follows:

The default entered on or about December 8, 2014 as against the Rallye Defendants shall be vacated;

The deadline for the Rallye Defendants to file their Answer to the Complaint is hereby extended to 28 days from the date this Stipulation is so ordered by the Court;

The Rallye Defendants agree that they will not file any motion pursuant to Fed. R. Civ. P. 12 against the original Complaint; and

Plaintiff agrees that he will not move to enforce any default judgment against the Rallye Defendants, and will assist the Rallye Defendants to vacate any such default judgment.

| Dated: Glen Cove, New York December 7, 20145 | Dated: New York, New York December 30, 2014 |
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| Steven John Moser, Esq. STEVEN J. Moser, P.C. School Street, Suite 207B Glen Cove, New York 11542 516) 671-1150 Attorneys for Plaintiff | James E. McGrath, III, Esq. PUTNEY, TWOMBLY, HALL & HIRSON LLP 521 Fifth Avenue New York, New York 10175 (212) 682-0020 Attorneys for Defendants, Rallye Motors, LLC, Rallye Motors Holding LLC, Rallye Leasing, Inc. Rallye Glen Cove, LLC, Rallye Northern, LLC, |
| | Rallye Roslyn, LLC, Rallye Roslyn Holding, LLC, Rallye Westbury, LLC |
| SO ORDERED: | |
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